

REMARKS/ARGUMENTS

As the Examiner is aware, this case is part of an original "bulk filing" by Motorola. Special IDS procedures have been approved for these cases; however it appears that the Examiner is requiring a statement of relevancy for these references in this particular case. Such is not required, nor has anyone else involved with these bulk filing cases asked for one. As this case is now being RCE'd, perhaps it would be well to transfer it to another Examiner more familiar with the bulk filings. SPE Chaudhury, SPE Flynn, SPE Lee, and Examiner Baumeister are good resources in this regard. A supplemental IDS is being filed herewith.

The applied rejections are now moot in view of the amendment to Claim 1, specifying a novel and unobvious semiconductor structure, as follows:

a substrate of a first monocrystalline silicon semiconductor material;

a strain-relief material layer-overlying said monocrystalline silicon semiconductor substrate and comprising an amorphous oxide material in contact with the monocrystalline silicon substrate and a monocrystalline metal oxide selected from the group consisting of alkaline earth metal titanates, alkaline earth metal zirconates, alkaline earth metal hafnates, alkaline earth metal tantalates, alkaline earth metal ruthenates, alkaline earth metal niobates, alkaline earth metal vanadates, alkaline earth metal tin-based perovskites, lanthanum aluminate, lanthanum scandium oxide, gadolinium oxide and mixtures thereof contacting the amorphous oxide material ;

a piezoelectric material overlying said at least one strain-relief material layer

this structure being claimed in combination with an electro-acoustic device at least partially in at least a portion of said piezoelectric material.

In this regard, the claims herein have been amended in order to be free of the prior art, and amended in accordance with discussions held between Applicants and the Patent Office. For example, these amendments place this case in condition for allowance by describing, in addition to other patentable features, a novel and unobvious semiconductor

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structure which is, itself, both novel and unobvious. For example, none of Guenzer, Grudkowski, or Kittle, even in combination, can be said to suggest the specific structure as now claimed in, e.g., pending Claim 1 herein. These amendments have resulted both from a study of the references cited in the various IDSs in this "bulk filing," and from associated discussions with PTO officials including SPE Chaudhury, SPE Flynn, SPE Lee, and others at the PTO.

As noted above, the amendment to the rejected claims places this case in condition for allowance. Accordingly, early notice to this effect is respectfully requested.

Respectfully submitted,

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